

CHRIS T. RASMUSSEN, ESQ.
Nevada Bar 7149
RASMUSSEN & KANG
330 South 3rd Street, Suite 1010
Las Vegas, Nevada 89101
(702) 464-6007
Attorney for Peter Santilli

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
PETER SANTILLI,)
)
Defendant.)
_____)

2:16-cr-00046-GMN-PAL

**REPLY TO GOVERNMENT
RESPONSE TO MOTION FOR
BILL OF PARTICULARS**

Defendant, PETER SANTILLI, by and through his attorney of record, Chris T. Rasmussen, Esq., submits the following Reply to Government's Motion For Bill of Particulars.

DATED this 30th day of May, 2016.

Respectfully submitted,

_____/s/_____
CHRIS T. RASMUSSEN, ESQ.
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Las Vegas, Nevada 89101
(702) 464-6007

1 (See Judge Brown Order, attached as Exhibit A).

2 This will allow for Santilli to properly defend against these charges. The
3 indictment currently contains gun charges which carry decades in prison for persons
4 who had no weapon in their possession. A conspiracy count to include anyone in the
5 area of Bunkerville, that is not a government employee, on the date of the alleged
6 "Stand Off" is alleged.
7

8 At Santilli's review of the Detention Order, the government played in court an
9 audio from the Pete Santilli Show that took place six months after the alleged "Stand
10 Off". It is impossible to understand exactly what conduct the government is presenting
11 as unlawful in their Superseding Indictment. Therefore, we request a similar statement
12 as the one Judge Brown ordered in the Oregon "Stand Off" case.
13

14 This demonstrates the frustration and difficulty defending against speech that is
15 alleged to occur during the protest and apparently six months after.
16

17 **Conclusion**

18 Santilli requests that this Court either issue an order for a Bill of Particulars or a
19 similar Order as in the Oregon case in which Judge Brown issued the attached Order.

20 DATED this 30th of May, 2016.

21 /s/ Chris T. Rasmussen

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25 Las Vegas, Nevada 89101
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